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UNITED STATES BANKRUPTCY COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
DEANNA HORVATH BRUNNER	:	BK. No. 17-14745-ref
Debtor	:	
	:	Chapter No. 13
DITECH FINANCIAL LLC	:	
Movant	:	
v.	:	
DEANNA HORVATH BRUNNER	:	
Respondent	:	

**OBJECTION OF DITECH FINANCIAL LLC TO CONFIRMATION OF THE DEBTOR'S
AMENDED CHAPTER 13 PLAN**

Movant, **DITECH FINANCIAL LLC** (hereinafter referred to as "Movant"), by its attorneys Phelan Hallinan Diamond & Jones, LLP hereby objects to confirmation of the Debtor's Amended Chapter 13 Plan as follows:

1. Movant is **DITECH FINANCIAL LLC**.
2. Debtor, DEANNA HORVATH BRUNNER, is the owner of the property located at 1522 VALLEY ROAD, BETHLEHEM, PA 18018.
3. Movant is in the process of drafting and filing a Proof of Claim. The approximate arrears are \$8,689.20
4. Debtor's Amended Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. Debtor's Amended Plan currently provides for payment to Movant in the amount of \$8,556.75.

A copy of the Debtor's Amended Plan is attached hereto as Exhibit "A" and made a part hereof.

6. Movant objects to Debtor's Amended Plan as it is underfunded. Debtor's Amended Plan should be further amended to fully fund the arrears owed to Movant. Confirmation of Debtor's proposed Amended Plan should be denied.

WHEREFORE, **DITECH FINANCIAL LLC** respectfully requests that this Honorable Court deny confirmation of the Debtor's Amended Chapter 13 Plan.

Respectfully Submitted,

/s/ Jerome Blank, Esquire
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Dated: August 16, 2017